City Scrap & Salvage Co. Inc.
of Akron

P.O. Box 3718 Akron, Ohio 44314 (330) 753-5051 FAX (330) 753-9266

December 1, 2010

Jose G. Cisneros
Chief, Remediation and Reuse Branch
U. S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Margaret M. Guerriero
Director, Land and Chemicals Division
U. S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: 785 Flora Avenue, Akron, Ohio

Dear Mr. Cisneros and Ms. Guerriero:

City Scrap & Salvage Company (the "Company") is the owner of the facility located at 785 Flora Avenue, Akron, Ohio (the "Facility Property"). In accordance with the requirements set forth by the United States Environmental Protection Agency ("USEPA") in its letter dated August 14, 2009, to the Company, a photocopy of which letter is attached hereto for reference, the Company is required to:

> ... notify the EPA within 20 working days of any conveyance of ownership or responsibility of the facility property. Such notice must include the date of the intended conveyance, and the name, address and phone number of the intended new owner or responsible person. If the conveyance is being made to a corporate entity, this notice must also include the name of a contact person.

For your reference, I have also attached the Deed Restriction which has been recorded with regard to the Facility Property under Instrument No. 55680552 in the Recorder's Office, County of Summit, State of Ohio.

Accordingly, the Company hereby provides formal notice to the USEPA of its intent to convey ownership of the Facility Property to TSB Metal Recycling, LLC ("TSB"). The contact person and address of TSB is as follows:

TSB Metal Recycling, LLC
1835 Dueber Avenue SW
Canton, Ohio 44706
Telephone No.: (330) 471-3937
Contact Person: Alan Oberster, VP – Environmental Health & Safety

The parties intend to close the contemplated transaction and convey ownership to the Property on **December 30, 2010.**

If you should have any questions concerning this notice, please do not hesitate to contact the undersigned.

Sincerely,

Steven M. Katz, President

Encl.

cc: William L. Caplan, Esq.
Nathan D. Bailey, Esq.
Grace Y. Ho, Esq.

«AK3:1048509_v1»

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
77 W. Jackson Blvd.
Chicago, IL 60604

Land and Chemicals Division

Correspondence for Land and Chemical Division Director's Signature

Subject: Conditional Approval of Self-Implementing PCB Cleanup for the City Scrap and Salvage Company located in Akron, Ohio.

TO:	Initials	Date
1. *Ken Bardo, Author, RRB, CAS2:*	KB	11/8/10
2. *George Hamper, Chief, CAS2:*		11/8/10
3. *Angela Jackson , Assistant, RRB*	AJ	11-9-10
4. *Jose G. Cisneros, Chief, RRB*		11/12/10

Comments:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 15 2010

REPLY TO THE ATTENTION OF:
LU-9J

Mr. Jeroen Winterink
Conestoga-Rovers & Associates
9033 Meridian Way
West Chester, Ohio 45069

RE: Self-Implementing PCB Cleanup
City Scrap and Salvage Company
611 West Wilbeth Road
Akron, Ohio 44314-1735

Dear Mr. Winterink,

We have completed our review of the November 5, 2010, notification and certification that you intend to conduct a self-implementing cleanup and disposal of PCB remediation waste in accordance with the requirements of 40 CFR 761.61(a). Based on our review, your notification and request to waive the 30-day notification period are hereby approved, subject to the following conditions:

1. As stated in 40 CFR 761.61(a), you must conduct the cleanup in accordance with all applicable requirements of 40 CFR 761.61(a)(1) through (9). A copy of those requirements is enclosed for your convenience. Based on the details provided in your notification for cleaning and encapsulating the Shredder Building, it appears that you have properly addressed the applicable requirements.

2. You must prepare a cleanup completion summary report that describes how you conducted the cleanup in accordance with the applicable regulatory requirements. You must send a copy to me within twenty days after the date of this letter.

3. As required by the EPA August 14, 2009, letter approving with conditions the Risk-Based Disposal under 40 C.F.R. § 761.61(c) , City Scrap and Salvage Company (CSSC) must notify EPA within 20 working days of any conveyance of ownership or responsibility of the facility property. Such notice must include the date of the intended conveyance, and the name, address, and phone number of the intended new owner or responsible person. If the conveyance is being made to a corporate entity, this notice must also include the name of a contact person. At least 10 working days before such conveyance, CSSC must submit to EPA a notarized affidavit signed by the intended new owner or responsible person that states that such person is aware of and shall abide by the provisions of the risk-based disposal conditional approval and self-implementing PCB cleanup approval granted to CSSC for this facility.

Please note that this approval does not relieve you from your duty to comply with all other applicable federal, state, and local requirements. In addition, please note that if you wish to make any changes to your notification (including changes in the project schedule), then you must submit your proposal to Ken Bardo, of my staff, in writing no less than seven calendar days prior to the proposed implementation of the change. If you have any questions, please contact him by e-mail at bardo.kenneth@epa.gov or by telephone at (312) 886-7566.

Sincerely,

Jose G. Cisneros
Chief
Remediation and Reuse Branch

Enclosure

cc: Karen Nesbit, Ohio EPA

ENCLOSURE

Regulatory Requirements of 40 CFR 761.61(a)

Please note that an "X" in the margin [ ] indicates that the notification and certification of your intention to conduct a self-implementing cleanup does not adequately explain how you intend to comply with the regulatory requirement. *For the City Scrap and Salvage Company site in Akron, Ohio, the November 5, 2010, notification adequately explains how compliance will be met.*

[ ] (1) ***Applicability***

(i) The self-implementing procedures may not be used to clean up:

(A) Surface or ground waters.

(B) Sediments in marine and freshwater ecosystems.

(C) Sewers or sewage treatment systems.

(D) Any private or public drinking water sources or distribution systems.

(E) Grazing lands.

(F) Vegetable gardens.

[ ] (ii) The self-implementing cleanup provisions shall not be binding upon cleanups conducted under other authorities, including but not limited to, actions conducted under section 104 or section 106 of CERCLA, or section 3004(u) and (v) or section 3008(h) of RCRA.

[ ] (2) ***Site characterization***. Any person conducting self-implementing cleanup of PCB remediation waste must characterize the site adequately to be able to provide the information required by paragraph (a)(3) of this section. Subpart N of this part provides a method for collecting new site characterization data or for assessing the sufficiency of existing site characterization data.

[ ] (3) ***Notification and certification***.

[ ] (i) At least 30 days prior to the date that the cleanup of a site begins, the person in charge of the cleanup or the owner of the property where the PCB remediation waste is located shall notify, in writing, the EPA Regional Administrator, the Director of the State or Tribal environmental protection agency, and the Director of the county or local environmental protection agency where the cleanup will be conducted. The notice shall include:

[ ] (A) The nature of the contamination, including kinds of materials contaminated.

[ ] (B) A summary of the procedures used to sample contaminated and adjacent areas and a table or cleanup site map showing PCB concentrations measured in all pre-cleanup characterization samples. The summary must include sample collection and analysis dates. The EPA Regional Administrator may require more detailed information including, but not limited to, additional characterization sampling or all sample identification numbers from all previous characterization activities at the cleanup site.

[ ] (i) *Bulk PCB remediation waste.* Bulk PCB remediation waste includes, but is not limited to, the following non-liquid PCB remediation waste: soil, sediments, dredged materials, muds, PCB sewage sludge, and industrial sludge.

[ ] (A) *High occupancy areas.* The cleanup level for bulk PCB remediation waste in high occupancy areas is ≤1 ppm without further conditions. High occupancy areas where bulk PCB remediation waste remains at concentrations >1 ppm and ≤10 ppm shall be covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

[ ] (B) *Low occupancy areas.*

[ ] (1) The cleanup level for bulk PCB remediation waste in low occupancy areas is ≤25 ppm unless otherwise specified in this paragraph.

[ ] (2) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤50 ppm if the site is secured by a fence and marked with a sign including the M_L mark.

[ ] (3) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤100 ppm if the site is covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

[ ] (ii) *Non-porous surfaces.* In high occupancy areas, the surface PCB cleanup standard is ≤ 10 μg/100 cm^2 of surface area. In low occupancy areas, the surface cleanup standard is <100 μg/100 cm^2 of surface area. Select sampling locations in accordance with subpart P of this part or a sampling plan approved under paragraph (c) of this section.

[ ] (iii) *Porous surfaces.* In both high and low occupancy areas, any person disposing of porous surfaces must do so based on the levels in paragraph (a)(4)(i) of this section. Porous surfaces may be cleaned up for use in accordance with §761.79(b)(4) or §761.30(p).

[ ] (iv) *Liquids.* In both high and low occupancy areas, cleanup levels are the concentrations specified in §761.79(b)(1) and (b)(2).

[ ] (v) *Change in the land use for a cleanup site.* Where there is an actual or proposed change in use of an area cleaned up to the levels of a low occupancy area, and the exposure of people or animal life in or at that area could reasonably be expected to increase, resulting in a change in status from a low occupancy area to a high occupancy area, the owner of the area shall clean up the area in accordance with the high occupancy area cleanup levels in paragraphs (a)(4)(i) through (a)(4)(iv) of this section.

[ ] (vi) The EPA Regional Administrator, as part of his or her response to a notification submitted in accordance with §761.61(a)(3) of this part, may require cleanup of the site, or portions of it, to more stringent cleanup levels than are otherwise required in this section, based on the proximity to areas such as residential dwellings, hospitals, schools, nursing

cleanup site by the generator, to each off-site facility where the waste is destined for an area not subject to a TSCA PCB Disposal Approval.

[ ] (3) Any person may decontaminate bulk PCB remediation waste in accordance with §761.79 and return the waste to the cleanup site for disposal as long as the cleanup standards of paragraph (a)(4) of this section are met.

[ ] (ii) Non-porous surfaces. PCB remediation waste non-porous surfaces shall be cleaned on-site or off-site for disposal on-site, disposal off-site, or use, as follows:

[ ] (A) For on-site disposal, non-porous surfaces shall be cleaned on-site or off-site to the levels in paragraph (a)(4)(ii) of this section using:
(1) Procedures approved under §761.79.
(2) Technologies approved under §761.60(e).
(3) Procedures or technologies approved under paragraph (c) of this section.

[ ] (B) For off-site disposal, non-porous surfaces:
(1) Having surface concentrations <100 μg/100 cm^2 shall be disposed of in accordance with paragraph (a)(5)(i)(B)(2)(ii) of this section. Metal surfaces may be thermally decontaminated in accordance with §761.79(c)(6)(i).
(2) Having surface concentrations ≥100 μg/100 cm^2 shall be disposed of in accordance with paragraph (a)(5)(i)(B)(2)(iii) of this section. Metal surfaces may be thermally decontaminated in accordance with §761.79(c)(6)(ii).

[ ] (C) For use, non-porous surfaces shall be decontaminated on-site or off-site to the standards specified in §761.79(b)(3) or in accordance with §761.79(c).

[ ] (iii) *Porous surfaces.* Porous surfaces shall be disposed on-site or off-site as bulk PCB remediation waste according to paragraph (a)(5)(i) of this section or decontaminated for use according to §761.79(b)(4), as applicable.

[ ] (iv) *Liquids.* Any person disposing of liquid PCB remediation waste shall either:
(A) Decontaminate the waste to the levels specified in §761.79(b)(1) or (b)(2).
(B) Dispose of the waste in accordance with paragraph (b) of this section or an approval issued under paragraph (c) of this section.

[ ] (v) *Cleanup wastes.* Any person generating the following wastes during and from the cleanup of PCB remediation waste shall dispose of or reuse them using one of the following methods:

[ ] (A) Non-liquid cleaning materials and personal protective equipment waste at any concentration, including non-porous surfaces and other non-liquid materials such as rags, gloves, booties, other disposable personal protective equipment, and similar materials resulting from cleanup activities shall be either decontaminated in accordance with §761.79(b) or (c), or disposed of in one of the following facilities, without regard to the requirements of subparts J and K of this part:

[ ] (8) ***Deed restrictions for caps, fences and low occupancy areas.*** When a cleanup activity conducted under this section includes the use of a fence or a cap, the owner of the site must maintain the fence or cap, in perpetuity. In addition, whenever a cap, or the procedures and requirements for a low occupancy area, is used, the owner of the site must meet the following conditions:

[ ] (i) Within 60 days of completion of a cleanup activity under this section, the owner of the property shall:

[ ] (A) Record, in accordance with State law, a notation on the deed to the property, or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property:

(1) That the land has been used for PCB remediation waste disposal and is restricted to use as a low occupancy area as defined in §761.3.

(2) Of the existence of the fence or cap and the requirement to maintain the fence or cap.

(3) The applicable cleanup levels left at the site, inside the fence, and/or under the cap.

[ ] (B) Submit a certification, signed by the owner, that he/she has recorded the notation specified in paragraph (a)(8)(i)(A) of this section to the EPA Regional Administrator.

[ ] (ii) The owner of a site being cleaned up under this section may remove a fence or cap after conducting additional cleanup activities and achieving cleanup levels, specified in paragraph (a)(4) of this section, which do not require a cap or fence. The owner may remove the notice on the deed no earlier than 30 days after achieving the cleanup levels specified in this section which do not require a fence or cap.

[ ] (9) ***Recordkeeping***. For paragraphs (a)(3), (a)(4), and (a)(5) of this section, recordkeeping is required in accordance with §761.125(c)(5).

CONESTOGA-ROVERS
& ASSOCIATES

9033 Meridian Way, West Chester, Ohio 45069
Telephone: 513-942-4750 Facsimile: 513-942-8585
www.CRAworld.com

November 5, 2010 Reference No. 053724

Ms. Susan Hedman
Regional Administrator
U.S. EPA Region V
77 W. Jackson Blvd. (LU-9J)
Chicago, IL 60604

Dear Ms. Hedman:

Re: Request for Approval of Self- Implementing PCB Cleanup
Remediation of PCB Impacts Under 40 CFR 761.61 A and
Waiver of 30-day Notification City Scrap and Salvage Facility
Akron, Ohio

As a follow up to our email earlier this week where we presented a brief summary of the analytical results and work undertaken within the 900 square foot Shredder Building of the City Scrap and Salvage (CSSC) facility in Akron, Ohio, this letter has been prepared to request approval of the cleaning and encapsulation that is proposed to address the residual PCBs that remain within the building. The proposed cleaning and disposal, followed by encapsulation will be implemented as a self-implementing remediation in accordance with 40 CFR 761 . 61 (a).

At this time, we are requesting, on behalf of the owners of CSSC, that the procedures outlined in Section 3 below are acceptable to be implemented as a self implementing measure, in accordance with 40CFR 761.61 (a) for the continued use and operation of the facility. The owners of the property request to implement these important control measures right away, and have retained a qualified contractor. The work, as described in Section 3 below is anticipated to require 7 to 10 days to complete.

A waiver of the 30-day notification period required per 40 CFR 761.61 (a) 3 (i) is requested consistent with 40 CFR 761.61 (a) 3 (iii). CSSC will provide, within 10 days of completion of the clean up, a complete summary report that will include all characterization data per 40 CFR 761.61 (3) B and C and, all post-remediation data per 40 CFR 761 part P, along with the signed certification required per 40 CFR 761.61 (3) E.

Remediation activities at the Site commenced over one year ago, and the owners of the Site continue to be motivated to address the PCBs that are present at the Site. Consistent with the approval given by USEPA of the risk based approach implemented in accordance with 761.61 (c), a notation on the deed to the property that identifies the presence of residual PCBs on the

property along with an activity use limitation was recorded at the Summit County registrar's office earlier this year following the remedial work undertaken on the property.

The Site has operated as a metal salvage and car shredding facility since the 1940s. An active mainline railway bounds the Site to the north while Flora Avenue and Cotter Merchandise Storage Company are adjacent to the southern boundary.

This request for approval includes a Site Location figure and a Site Plan figure along with the certification statement (Attachment A).

1.0 SITE DESCRIPTION

The Site is bounded to the north by an active rail line, owned and operated by CSX. A fence separates the CSX railway from the scrap yard. The eastern south boundary of the Lower Yard is located along a steep embankment and then Flora Avenue, while the western south boundary is also located along a steep embankment that has an inactive rail siding and the Cotter Merchandise Storage Company building. A buried storm drain culvert that originates north of the CSX railway discharges along the southern side of the Site, near the intersection of Flora and 11th Street. The effluent from this culvert flows south into a shallow ditch that then flows into another culvert which flows south under Flora Avenue to another ditch located south of Flora Avenue.

The Shredder Building is a concrete and steel structure that has a footprint area of approximately 900 square feet. The Shredder Building houses two, 1,500 horsepower natural gas fuelled motors that power the metal shredder mill located along the north side exterior of the building. The two large motors are located on the upper floor of the Shredder Building, along with hydraulic pumps, oil coolers, air compressors and various supplies and materials needed to operate the shredder. The ground level (or lower level) has been used primarily for storage of equipment, parts and materials utilized for operation of the shredder. Two blind sumps are located in the lower level that accumulate fluids from shredder motors and controls.

A Remediation Complete Report (RC) was submitted to USEPA on February 4, 2010, for the remediation work previously completed at the CSSC facility. The RC Report was prepared in accordance with the requirements of "The Approval With Condition" letter received from USEPA dated August 14, 2009 for approval to proceed with the Risk-Based Disposal as described in the letter to USEPA dated August 3, 2009 and revised Figures 4a and 4b of the application emailed on August 5, 2009 for the cleanup of Polychlorinated Biphenyls (PCB) impacted soils at the CSSC Facility located in Akron, Ohio. On February 23, 2010, USEPA provided a letter concurring that remediation was complete for the Site soils.

2.0 CHARACTERIZATION - 40 CFR 761.61(A)(2)

From June through October 2010, site characterization activities were completed in the shredder building to identify the source of PCBs detected in water and oil samples obtained from two floor sumps. The analytical results of the sampling activities conducted by CRA, SHA and Sunpro are summarized in the attached Tables 1 and 2. Figure 1 presents the Site location and Figure 2 presents the Site plan. Figure 3 presents a floor plan of the ground level of the Shredder Building, including the location of the sumps.

Site characterization activities within the shredder building were initiated in response to the detection of PCBs in waste oil. The concentrations of PCBs in the oil samples from the floor sumps have ranged from 4.4 milligrams per kilograms (mg/kg) to 32 mg/kg. The PCB concentrations in the samples from the oily water beneath the floating oil in the floor sumps were significantly lower, ranging from <0.0005 milligrams per liter (mg/l) to 0.065 mg/l.

Nine additional samples of oil and grease were collected from various surfaces within the shredder building, including the first floor surface, the overhead beams on the first floor, second floor surface drip pans beneath a natural gas engine, and insulation on the walls and overhead beams in the second floor. The concentration of PCBs in these samples ranged from 0.44 mg/kg and 11 mg/kg. In addition, PCB were detected in two wipe samples obtained from the second floor at concentration of 18 micrograms per 100 square centimeters (ug/100 cm2) and 28 ug/100 cm2, as well as in a sample of process water at 0.028 mg/kg. The PCB concentrations in 4 insulation samples obtained from the second floor ranged from non-detect to 14 mg/kg. Overall, the concentrations of PCBs in these samples vary, with no apparent trend or distribution that identifies the location of a PCB source.

A reconnaissance of the shredder building identified the following equipment from which oil could potentially accumulate in the floor sumps:

- Natural Gas Engine #1
- Natural Gas Engine #2
- Engine Starter
- Drive Unit For Shredder
- Air Compressor
- Hydraulic Power Unit
- Bearing Oil Pump #1

- Bearing Oil Pump #2
- Oil Drip Pan for Evaporator
- Oil Drip Pan for Oil Pump
- Oil Drip Pan for New Oil Storage Area

The oil from each of the above pieces of equipment was sampled, and PCBs were not detected in these 11 oil samples. No other potential sources of PCB concentration have been identified. The data suggests that residual PCB contamination remains in porous surfaces inside the shredder building from either a former episodic event or a form piece of equipment.

In summary, here is a listing of the characterization sample results and actions taken to date at the Shredder Building:

1. On June 18, 2010, SHA samples ground floor sumps after PCBs discovered in oil removed from the oil/water separator. PCB level in sump oil layer is 25 ppm.
2. On June 28, 2010, SHA samples oil from equipment in the shredder building. All samples are ND for PCBs.
3. On June 30, 2010, SHA samples oil layer in building sumps. Total PCBS are 20 and 28 ppm.
4. On July 6, 2010, CRA cores through lower level concrete floor and collects samples of soil (7 total) from below ground slab. Total PCBs (in ppm) for the seven soil samples are 0.5, ND, 0.2, 1.3, 4.5, ND and ND.
5. On July 13, 2010 the two ground floor sumps are removed by CRA. The old sumps were constructed as blind (no discharge, not connected to anything) but had become porous due to corrosion.
6. On July 14, 2010, CRA collects post-excavation samples of soil from excavated sump walls and floors on July 13, 2010. Total PCBs (in ppm) for wall and floor samples are 0.67, 0.93, 0.34 and ND.
7. City Scrap reconstructs new blind floor sumps.
8. On July 23, 2010 a shallow well is constructed outside of the shredder building- Well remains dry and is therefore not sampled.
9. On July 23, 2010, oily water in ground floor sumps is sampled and analyzed for PCBS. Total PCBs are ND and 0.0011 ppm.
10. On August 12, 2010, Oily water in the ground floor sumps is sampled and analyzed for PCBs. Total PCBS (in ppm) are 6.2 and 0.052 for the oil and 0.0015 and 0.018 for the water layer.
11. On August 18, 2010 the grit chamber and oil water separator are pumped out and steam cleaned.

12. On September 7, 2010 CRA and SHA collect samples from drip pans, 2 sumps, oil on floor, greasy grime on ceiling beams. Total PCBs (in ppm) for oil layer in the sump is 5.28 and is ND for the equipment. The three greasy grime samples have Total PCBs of 14, 12 and 5. The oil sample from an oil drip from upper floor has Total PCBS of 0.44 ppm.
13. On September 21, 2010, a limited cleansing of the shredder building ground floor and second floor using degreaser and steam cleaner was undertaken.
14. On September 29, 2010, CRA and SHA sample oily water from the two ground floor sumps, along with grease from second floor motor support stands. Total PCBs for oil in sumps is 17 and 10 ppm. Total PCBs for grease on a second floor motor support is 13 ppm.
15. On October 6, 2010, CRA samples wall insulation, engine crankcases and other oil containing devices. (The natural gas expansion tanks are examined for oil residue, but none is found). Total PCBs for the oil containing devices are ND. The wall insulation has 3.5 ppm.
16. On October 12 , 2010, SHA collects samples of second floor oil drip pans, motor supports, concrete wipe samples and oil drips from second floor. Results for the oil samples are 1.2, 2.2, ND, 5.9, 11 and 4.4 ppm. The two wipe samples had results of 28 and 18 ug/100 cm2.
17. On October 29, 2010, CSSC collects samples of the wall insulation on the second floor from the south wall, near the east engine and near the west engine with analytical results for these three samples are 14 ppm, 4.4 ppm and non-detect, respectively.

Numerous samples of oils, grease and grime in the shredder building have been collected and analyzed, with several samples continuing to have positive PCB concentrations. Both CRA, representing the owners of the property and Sanborn Head Associates, representing the prospective purchaser of the property, have examined the building and concur that all likely potential sources of the PCBs have been sampled and analyzed with no ongoing new source of the PCBs becoming identified.

3.0 PROPOSED CLEANING AND ENCAPSULATION

As there are no additional potential ongoing sources of PCBs to be sampled, the appropriate next step is to implement the proposed cleaning and encapsulation to ensure that all of the surface oils, grease and grime within the building will be removed and the remaining surfaces will be sealed with an appropriate coating that can be maintained. In accordance with 761.3 (p) continued use of porous surfaces, the residual PCBs within the concrete will become encapsulated and will not elute or be able to become commingled with future releases of oil or grease within the building.

Cleaning of the interior of the shredder building will require the shredder operations to be shutdown until completed. All work will be conducted in accordance with site-specific health and safety plan (HASP) for the project, specifically for employees and subcontractors, in accordance with OSHA requirements

Initial steps

- Shut power off to the shredder building.
- Place poly sheeting over electrical panels and controls to protect from water damage.
- Remove all loose equipment & materials from the floor areas in the shredder building.
- Remove liquid from the 2 lower level building sumps and containerize for disposal.
- Hand wipe visible oil from the engines, hoses, compressors, hydraulic system, above-grade structures, etc.
- Use mechanical scrapers to remove gross oil and grit from the floor areas.

Walls & Ceiling (Second Floor Area)

- These walls are metal siding attached to a steel building frame. Portions of the siding and building frame are covered with a sprayed on insulation material that contains low levels of PCBs. To remove the PCBs from these surfaces, all of the insulation will be removed, resulting in bare metal surfaces.
- The insulation will be removed using mechanical scrapers and containerized for disposal.
- HEPA vacuum cleaned surfaces and verify removal with wipe samples of remediated surfaces.
- In accordance with 40 CFR 761 subpart p, verification wipe sample procedures will include the preparation of a systemic grid layout out of the remediated wall and ceiling area. Wipe sampling will be performed utilizing a 10 square-foot characterization grid, with an estimated 25 grid locations.
- In accordance with 40 CFR 761.61 (a) 4 (ii) non-porous surfaces, the surfaces will be cleaned to a level of less than 10 ug/ 100 cm2.

Walls (First Floor Area)

- In accordance with 40 CFR 761.30 p (ii) A, the procedure for cleaning the porous walls is found in 40 CFR 761.375. For the lower level walls, all walls will be double washed using Citri-kleen (solvent emulsion) . Additional mechanical or solvent cleaning will be performed if visible residual oil contamination remains.
- Complete a final rinse of the wall areas with clean water.
- Following drying, the surfaces will be covered with a double layer of solvent resistant and water repellant coating per 40 CFR 761.p (iii) A (1). To accomplish this, sealer made by General Polymers will be utilized. The applications will consist

of a clear coat sealer (~1 mil) followed by two coats of contrasting colored, high solids epoxy encapsulant (~ 3.5 mils per layer).

- In accordance with 40 CFR 761.30 p (iii) B, once the coatings have cured, the Large PCB Mark M_L placards, as described in 40 CFR 761.45 (a) will be attached with mechanical fasteners to each wall approximately five feet above the finished floor level. Should these placards wear out, they will be replaced.

Floors Procedures

- In accordance with 40 CFR 761.30 p (ii) A, the procedure for cleaning the porous concrete floors is found in 40 CFR 761.375. This procedure will consist of a complete double wash of floor surfaces using Citri-kleen (solvent emulsion). Additional mechanical or solvent cleaning will be performed if visible residual oil contamination remains.
- Complete a final rinse of the floor areas with clean water.
- Following drying, the surfaces will be covered with a double layer of solvent resistant and water repellant coating per 40 CFR 761.p (iii) A (1). This will be accomplished by application of General Polymers products consisting of a clear coat sealer (~1 mil) followed by two coats of contrasting colored, high solids epoxy encapsulant (~ 3.5 mils per layer).
- In accordance with 40 CFR 761.30 p (iii) B, once the coatings have cured, the Large PCB Mark M_L placards, as described in 40 CFR 761.45 (a) will be attached to each wall approximately five feet above the finished floor level. Should these placards wear out, they will be replaced.

Miscellaneous

- All encapsulants products will be applied by authorized installer.
- Applications of the various encapsulant products will be conducted only after painted surfaces have dried according to manufacturer's specifications.
- Containerize all spent liquids collected in the lower level sumps.
- Collect all spent fluids, PPE and cleaning materials for containerization and disposal off site as a PCB waste in accordance with the requirements of 40 CFR 761.378 and 40 CFR 761.79 (g)
- Seal openings between the second floor and the lower room using expanding foam insulation.
- Apply a dri-lock base sealer to lower portion of the inside surface of the first floor north wall, west side if concrete surface is visibly wet, before application of any encapsulation product.

4.0 INSTITUTIONAL CONTROLS

As part of the Remediation Complete Report submitted to USEPA on February 4, 2010, a copy of the deed restriction that was prepared and recorded at the Summit County Registers Office for the Site as required under 40 CFR 761.61 (a) (8) was included in that report. None of the additional work to be conducted or investigative results under taken since the filing of the deed restriction will require any changes or modifications to the deed restriction on file.

5.0 CERTIFICATION STATEMENT

Attachment A to this letter is a signed certification statement prepared in accordance with 40 CFR 761.61 (a) (3) (E) that identifies that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrument/ chemical analysis procedures used to assess or characterize the PCB contamination at the Site are on file at the location designated in the certificate.

If you have any questions, please do not hesitate to contact us at your convenience.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Jeroen Winterink

JAW/po/05
Encl.

cc: Peter Ramanauskas (USEPA Region V)
Ken Bardo (USEPA Region V)
Neal Weinfield (Greenberg Traurig, LLP)
Steve Katz (City Scrap & Salvage)
Randy Katz (City Scrap & Salvage)
Henry Cooke (CRA)

Attachments:
Figure 1 - Site Location
Figure 2 -Sample Locations
Figure 3- Shedder Building Floor Plan
Attachment A - Copy of Owner's Certification Statement

TABLE 1
Summary af Analytical Results far PCBs - 2010
City Scrap Salvnge - Shredder Building
Akran, Ohia

Medin	Identificatian	Sample Date	Sample Descriptian	PCB Cancentratian
Oil	EFS Oil	6/18/2010	Flaating ail within castern flaor sump inside shredder building	25
	WFS Oil	6/18/2010	Flaating oil within western flaor sump inside shredder building	25
	Air Camp	6/28/2010	Air campressar inside secand floar of shredder building	<1.0
	Drive Unit	6/28/2010	Drive unit inside second flaar of shredder building	<1.0
	Engine 1	6/28/2010	Natural Gas Engiae # 1 inside second floor af shredder building	<1.0
	Eagine 2	6/28/2010	Natural Gas Engina # 2 inside secand flaor nf shredder building	<1.0
	Hyd Unit	6/28/2010	Hydraulic unit inside secoad flaor of shredder building	<1.0
	N Bearing Pump	6/28/2010	Bearing ail pump in narthern portion of first floar af shredder building	<1.0
	S. Bearing Pump	6/28/2010	Bearing ail pump in sauthern partian of first flaar af shredder building	<1.0
	Starter	6/28/2010	Engine starter ail discharge drum inside first flaor af shredder building	<1.0
	EFS Dil	6/30/2010	Canfirmation sample af flaating oil within eastern flaar sump inside shredder building	28
	WFS Oil	6/30/2010	Caafirmatian sample af flaating ail within westem flaar sump inside shredder building	20
	EPS Oil	9/29/2010	Caafirmatiaa sample af flaating ail within eastern flaar sump inside shredder building	9.4
	WFS Oil	9/29/2010	Canfirmatica sample af flaating oil within western flaar sump inside shredder building	32
	DP-1	10/6/2010	Split sample af ail callected by CRA from drip pan belaw narthern end af western engine	1.2
	DP-2	10/6/2010	Split sample of oil callected by CRA fram drip psn belaw sauthern end of western engine	2.2
	DP-3	10/6/2010	Split sample of ail collected by CRA from drip pan belaw narthera end af eastern engine	<1.0
	FSO-1	10/13/2010	First flaar, western wall	11
	FSO-2	10/13/2010	First flaor, western wall	4.4
Sedimeat	OWS Dutfall	6/18/2010	Sediment within starmwater ditch lacated bclow riprap far ail/water separatar	<0.13
	S. Flara Outfall	6/18/2010	Sediment in dawnstream starmwater ditch ta the south af Flara Ave.	<0.18
	Grit Chamber	6/21/2010	Sedimeat in bottam of grit chamber	7.8
Sludge	FG-1	10/6/2010	Split sample af floar grit callected by CRA from 2nd flaar between castem and westen eagines	5.9
Water	EPS Discharge Water	6/18/2010	Water discharged by pump in eastern flaar sump inside shredder building	0.010
	E Water	7/14/2010	Water that infiltrated inta the eastern excavation fallowing remavsl af the metal sump and campletion af sail remaval activities	0.065
	W Water	7/15/2010	Water that infiltrated inta the western excavatian fallowing remaval af the metal sump and campletian af sail removal activities	0.0014
	E Water	7/23/2010	Split-sample af water callected by CRA from beneath floating ail that accumulated in eastern sump excavatian	<0.0005
	W Water	7/23/2010	Split-sample af water callected by CRA from beneath flastiag oil that accumulated in western sump excavatioa	<0.0005
	MW-104	7/23/2010	Split sample of graundwater abtained by CRA from replacement well MW-104	<0.0005
	OWS Outfall	7/28/2010	Starmwater discharge fram oil/water separatar during rsin event	0.00069
	MW-205	7/30/2010	Gmundwater ssmple abtained from manitor'ng well MW-205	<0.0005
	Lawar Yard Culvert	9/16/2010	Starmwater discharge fram culvert during rain event	<0.0005
	Dutfalt 001	9/16/2010	Stormwater discharge from oil/water separator during rain event	0.0021
	Dutfalt 002	9/16/2010	Stormwater discharge from Outfall 5 duriag rain event	0.0007
	Dutfall 003	9/16/2010	Stormwater dischsrge fram Outfall 6 during rain event	0.00025 J , *0.00028 J*
	EFS Discharge Water	9/29/2010	Water discharged by pump in eastern floar sump inside shredder building	0.0009
	Dust Cantral Effluent	10/12/2010		0.028
Wipe	FSW-1	10/13/2010	Engine #2	0.018
	FSW-2	10/13/2010	Engine #1	0.028

Nates:

1. This table summarizes the analytical results far samples selected far PCB analysc by Sanbarn Head and Associatcs, Iac.

2. Dil, sludge, sedimeat, and water sample cancentratians are in parts per millian (pprn). Wipe sample cancentratians are in iailagrams per ane hundred square centimeters (mg/100cm^2).

3. Cancentratians are shawn far the twa detected arachlars, Arachlar 1242 and Arachlar 1260 (italicized).

4. "<" indicates the cancentratians in the callected sample were less than the methad reparting limit.

5. "J" indicates estimated results. The value reparted is belaw the standard labaratary reporting limit, but abave the labaratory detection limit.

TABLE 2
Summary of Analytical Results for PCBs - 2010
City Scrap Salvage - Shredder Building
Akron, Ohio

Media	Identification	Sample Date	Sample Description	PCB Concentration
Oil	G-53724-090710-JW-7001	9/7/2010	Oil layer west sump	4.4 , *0.88 J*
	G-53724-090710-JW-7002	9/7/2010	Water layer - west sump	<1.0
	G-53724-090710-JW-7003	9/7/2010	Oil skimmer - east sump	<10.0
	G-53724-090710-JW-7004	9/7/2010	Oil drip pans - new oil containers	<1.0
	G-53724-090710-JW-7005	9/7/2010	Evaporator dip pan south east side	<10.0
	G-53724-090710-JW-7006	9/7/2010	Oil pumps drip pan northeast corner	<10.0
	G-53724-090710-JW-7007	9/7/2010	Oil on floor - west side	0.44 J
	G-53724-090710-JW-7008	9/7/2010	Grease from ceiling beams- south east corner	11.0 , *3.2*
	G-53724-090710-JW-7009	9/7/2010	Grease from ceiling beams- north east corner	9.6 , *2.4*
	G-53724-090710-JW-7010	9/7/2010	Grease from ceiling beams - west side	4.5 , *0.73 J*
	S-53724-100610-GL-001	10/6/2010	Oil from governor #2 engine	<0.326
	S-53724-100610-GL-002	10/6/2010	Oil from crankcase #2 engine	<0.133
	S-53724-100610-GL-003	10/6/2010	Oil from crankcase #1 engine	<0.132
	S-53724-100610-GL-004	10/6/2010	Engine coolant lines	<0.128
Insulation	S-53724-100610-GL-005	10/6/2010	Fire-proofing material from above eastern engine	3.49
	Sunpro	10/29/2010	Fire-proofing material from south wall	14
	Sunpro	10/29/2010	Fire-proofing material from adjacent eastern engine	4.4
	Sunpro	10/29/2010	Fire-proofing material from adjacent western engine	ND

Notes:

1. This table summarizes the analytical results for samples selected for PCB analyses by CRA and Sunpro.

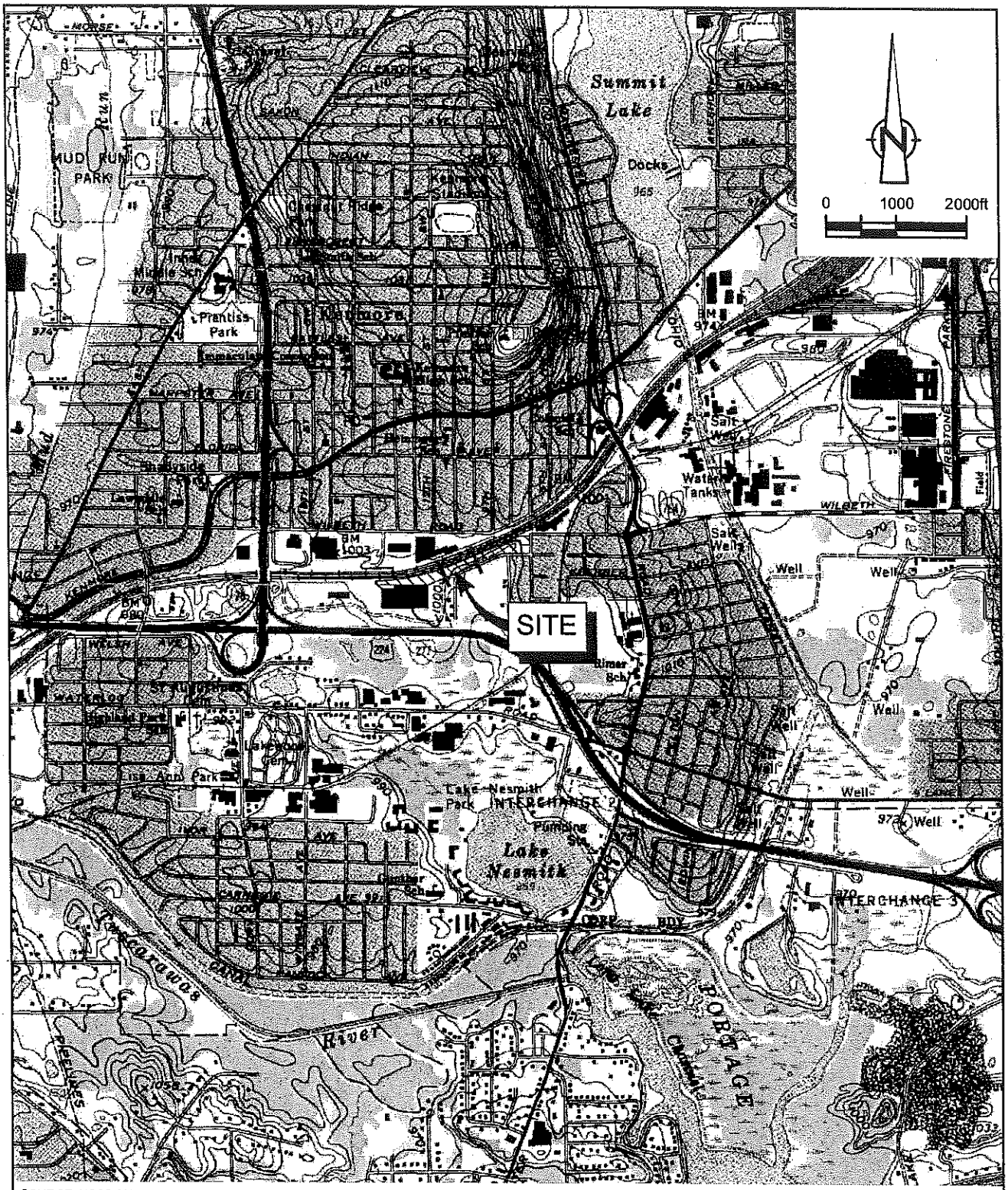
2. Water concentrations are in milligrams per liter (mg/l); oil and sediment concentrations are in milligrams per kilogram (mg/kg).

3. Concentrations are shown for the two detected arochlors, Arochlor 1242 and Arochlor 1254 (italicized).

4. "<" indicates the concentrations in the collected sample were less than the method reporting limit.

5. "J" indicates estimated results. The value reported is below the standard laboratory reporting limit, but above the laboratory detection limit.

6. PCB analyses were conducted by Test America Laboratories, Canton, Ohio using United States Environmental Protection Agency Method SW846-8082.



SOURCE: USGS QUAD AKRON WEST, OHIO.

figure 1

SITE LOCATION MAP
CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

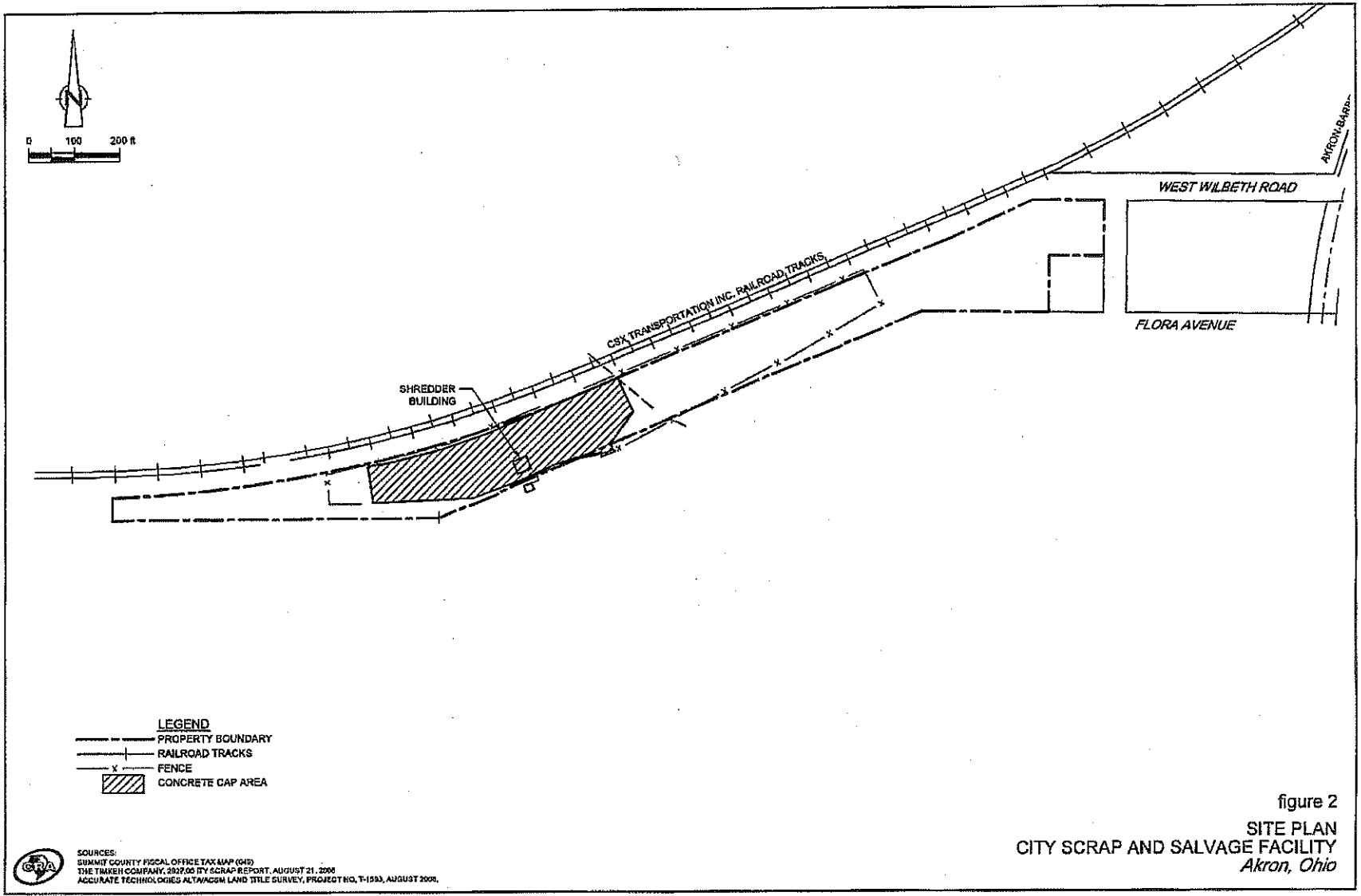
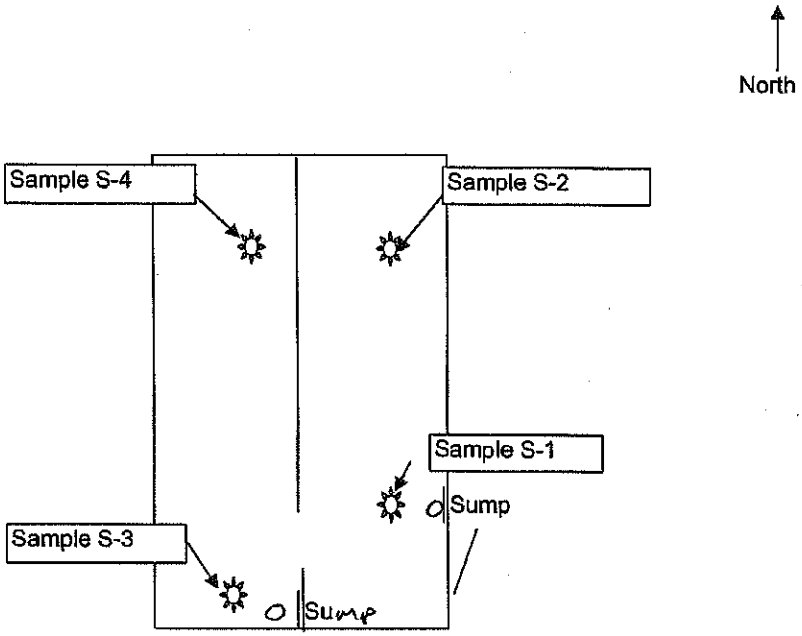


figure 2

SITE PLAN
CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

SOURCES:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY, 2927.00 ITY SCRAP REPORT, AUGUST 21, 2006
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY, PROJECT NO. T-1593, AUGUST 2006.

53724-00(RAMA006)GN-WA002 NOV 05/201D



SHREDDER BUILDING - GROUND LEVEL

figure 3
Shredder Building Ground Floor
City Scrap and Salvage Facility
Akron, Ohio

CERTIFICATION STATEMENT

We, the undersigned, hereby certify that, in accordance with 40 CFR 761.61 (a) (3) (E) all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrument/ chemical analysis procedures used to assess or characterize the PCB contamination at the Site are on file at the location designated below.

Location of documents: Consultant's office in West Chester, Ohio

On Behalf of Owner	On behalf of Consultant
Owner: City Scrap And Salvage	**Consultant:** Conestoga-Rovers & Associates
Representative: STEVEN M. KATZ	**Representative:** Jeroen Witteveen
Signature:	**Signature:**
Address: 765 Flora Avenue Akron, Ohio	**Address:** 9033 Meridian Way West Chester, Ohio 45069
Date: 11-5-10	**Date:** 11-5-10

40 CFR 761.30(p)
76 (79 (b)

Re: 53724 - City Scrap Site in Akron , Ohio - PCBs in the Shredder Engine Building~COR-053724~

Kenneth Bardo to: WInterink, Jeroen 11/04/2010 12:49 PM

Cc: "Project Email Hold", "Cooke, Henry", Peter Ramanauskas, "Paul Gallagher", George Hamper

hi, jeroen. the TSCA regs at 40 CFR 761.61(a)(3) provide the notification and certification procedures for self-implementing cleanups. notification to EPA is to be provided at least 30 days prior to starting the cleanup, and EPA has 30 days to respond in writing to approve, disapprove, or request additional information. if an EPA response is not received within 30 days of notification, the submitter may assume that the process is complete and acceptable. any EPA response for self-implementing cleanups is from the Remediation and Reuse Branch Chief.

your e-mail indicates that work could be begin as early as this saturday, and would take 7 days to complete. EPA has not reviewed your proposal to see if it complies with TSCA cleanup requirements. if your e-mail is intended as a formal notification of a self-implementing cleanup and you would like to help expedite EPA's review, please cross-reference the procedures described below with the pertinent self-implementing cleanup regulations. thanks, ken
i

"Winterink, Jeroen" 11/03/2010 09:56:25 AM

From:	"Winterink, Jeroen" <jwinterink@craworld.com>
To:	Kenneth Bardo/R5/USEPA/US@EPA, Peter Ramanauskas/R5/USEPA/US@EPA
Cc:	"Cooke, Henry" <hpcooke@craworld.com>, "Project Email Hold" <filing@craworld.com>, "Paul Gallagher" <pgallagher@sanbornhead.com>
Date:	11/03/2010 09:56 AM
Subject:	53724 - City Scrap Site in Akron, Ohio - PCBs in the Shredder Engine Building~COR-053724~

Peter, Ken:

As a follow-up to my email last week where I presented a brief summary of the analytical results and work undertaken within the 900 square foot shredder engine building of the City Scrap and Salvage facility in Akron, Ohio, below is an outline of the cleaning and encapsulation that is proposed to address the residual PCBs that remain within the building. Numerous samples of oils, grease and grime in the Shredder Building have been collected and analyzed, with several samples continuing to have positive PCB concentrations following a cleaning event. Both CRA, representing the owners of the property and Sanborn Head Associates, representing the prospective purchaser of the property, have examined the building and concur that all likely potential sources of the PCBs have been sampled and analyzed with no clear source of the PCBs becoming identified. As there are no additional potential sources of the PCBs to be sampled, the appropriate next step is to implement the proposed cleaning and encapsulation to ensure that all of the surface oils, grease and grime within the building will be removed and the remaining surfaces will be sealed with an appropriate coating that can be maintained. Residual PCBs within the concrete will become encapsulated and will not elute or be able to become commingled with future releases of oil or grease within the building. As a final measure, oils and greases that accumulate on the lower floor of the structure will be routine characterized for PCBs and will be managed as oil containing low level PCBs, unless proven otherwise.

As you are aware, remediation activities at the Site commenced over one year ago, and the owners of the Site continue to be motivated to address the PCBs that are present at the Site. A notation on the deed to the property that identifies the presence of residual PCBs on the property along with an activity use limitation was recorded at the Summit County registrar's office earlier this year following the remedial work undertaken on the property.

At this time, we are requesting, on behalf of the owners of City Scrap and Salvage, that the procedures outlined below are acceptable to be implemented as control measures for the continued use and operation of the facility. The owners of the property request to implement these important control measures right away, and have retained a qualified contractor to commence this work as early as November 6, 2010. The work, as described below is anticipated to require 7 days to complete.

Initial steps

- Shut power off to the shredder building.
- Place poly sheeting over electrical panels and controls to protect from water damage.
- Remove all loose equipment & materials from the floor areas in the shredder building.
- Remove liquid from the lower level building sumps (2).
- Hand wipe visible oil from the engines, hoses, compressors, hydraulic system, above-grade structures, etc.
- Use mechanical scrapers to remove gross oil and grit from the floor areas.

Walls & Ceiling (Second Floor Area)

- Use mechanical scrapers to remove PCB impacted sprayed on insulation from the second floor building wall(s) and ceiling structural steel. HEPA vacuum cleaned surfaces and verify removal with wipe samples of surfaces.

Walls (First Floor Area)

- Complete a double wash of wall surfaces using Citri-kleen (solvent emulsion). Additional mechanical or solvent cleaning will be performed if visible residual oil contamination remains.
- Complete a final rinse of the wall areas with clean water.
- Divide wall into grids and take concrete core samples for PCB analysis. If core samples record PCB concentration of 1 ppm or higher, proceed with application of paint on the walls as noted below.
- Following drying for at least 24 hours, apply a clear coat (approximately 15-mil - thick) primer of Flowcrete Flowfast 101- Standard Primer on the cleaned walls.
- Apply a white coat (approximately 8-mil thick) of Flowcrete Block Sealer epoxy on the walls that are primed.
- Apply one grey coat (approximately 8-mil thick) of Flowcrete Peran WW finish to walls in the shredder building following cleaning.

Floors Procedures

- Complete a double wash of floor surfaces using Citri-kleen (solvent emulsion). Additional

mechanical or solvent cleaning will be performed if visible residual oil contamination remains.

- Complete a final rinse of the floor areas with clean water.
- Following drying for at least 24 hours, apply a clear coat (approximately 15-mil thick) of Flowcrete Flowfast 101- Standard Primer on clean floor.
- Apply a white coat (approximately 15-mil thick) of Flowcrete Flowfast 307-Standard Sealer on floor that has been primed.
- Apply a grey coat (an approximate 8-mil thick) of Flowcrete Deckshield Rapide-ID on floor that has been sealed.

Miscellaneous

- All Flowcrete products will be applied by a Flowcrete authorized installer.
- Applications of the various Flowcrete products will be conducted only after painted surfaces have dried according to Flowcrete specifications.
- Containerize all spent liquids collected in the lower level sumps.
- Collect all spent fluids, PPE and cleaning materials for containerization and disposal off site as a PCB waste.
- Seal openings between the second floor and the lower room using expanding foam insulation.
- Apply a dri-lock base sealer to lower portion of the inside surface of the first floor north wall, west side if concrete surface is visibly wet, before application of any Flowcrete product.

Should any additional information be required, please do not hesitate to contact the undersigned. Thank-you for your consideration of this matter.

Sincerely,
Jeroen

Jeroen Winterink, P. Eng.
Conestoga-Rovers & Associates (CRA)
9033 Meridian Way
West Chester, OH 45069

Phone: 513.942.4750
Fax: 513.942.8585
Cell: 513.919.5297
Email: jwinterink@CRAworld.com
www.CRAworld.com

Perform every task the safe way, the right way, every time!

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

February 23, 2010

REPLY TO THE ATTENTION OF: LU-9J

Mr. Jeroen Winterink
Conestoga-Rovers & Associates
9033 Meridian Way
West Chester, Ohio 45069

RE: Remediation Complete Report for Risk Based Disposal
City Scrap & Salvage Company
Akron, Ohio

Dear Mr. Winterink:

The United States Environmental Protection Agency, Region 5 (EPA) has reviewed the *Remediation Complete Report of Risk Based Disposal, Remediation of PCB Impacted Soils Under 40 CFR 761.61C* submitted on February 4, 2010, for the City Scrap & Salvage Company (CSSC). The CSSC site consists of a narrow 6-acre parcel of property located at 785 Flora Avenue in the City of Akron, Summit County, Ohio.

The report documents the soil removal activities, post soil removal confirmation sampling, and disposal of PCB-impacted soil commenced on August 24, 2009, and completed on December 18, 2009, as required by the EPA August 14, 2009, letter providing approval with conditions for risk-based cleanup and disposal of PCBs at the CSSC property.

Over 282 tons of soil containing PCBs greater than 50 parts per million (ppm) was removed and disposed off-site at the EQ Landfill in Belleville, Michigan. Over 3,300 tons of soil containing PCBs less than 50 ppm was removed and disposed off-site at the WM American Landfill located in Waynesburg, Ohio. The PCB soil remediation objectives of: 1) less than 10 parts per million (ppm) under the minimum 9" new concrete slab in the vicinity of the Shredder Building; 2) total concentrations less than 10 ppm and an average of less than 1 ppm in exposed areas west and east of the Shredder Building; and 3) less than 1 ppm at all off-site locations along Flora Avenue and CSX Railroad property, was achieved following completion of the soil excavation and re-excavation described and certified in the report.

To satisfy EPA's condition for property use and restrictions, a deed restriction was filed in the County of Summit, Recorder's Office on February 3, 2010. The deed restriction establishes an environmental land use control on the property (legal description and map of the property provided in Exhibits A and B), provides for the property to be only used for industrial or commercial uses, and provides for the requirement and maintenance of a security fence and concrete slab cap on the property.

Based on this information, EPA concurs that PCB remediation activities are complete at the CSSC site. This letter does not relieve the site owner from compliance with any other federal, state or local regulations and does not preclude EPA from initiating any enforcement action, including an action seeking civil penalties for any violation of federal regulations. Conditions of EPA's approval of August 14, 2009, and other applicable requirements of TSCA and its regulations will continue to apply to the site after any change in ownership.

If you have any further questions regarding this matter, please feel free to contact me at (312) 886-7566.

Sincerely,

Kenneth Bardo

Kenneth Bardo
Environmental Scientist
Remediation and Reuse Branch

cc: Karen Nesbit, Ohio EPA

CONESTOGA-ROVERS
& ASSOCIATES

9033 Meridian Way, West Chester, Ohio 45069
Telephone: 513-942-4750 Facsimile: 513-942-8585
www.CRAworld.com

June 11, 2009 Reference No. 053724

Mr. Peter Ramanauskas
United States Environmental Protection Agency, Region V
77 W. Jackson Blvd. (LU-9J)
Chicago, IL 60604

Dear Mr. Ramanauskas:

Re: Proposed Polychlorinated Biphenyls (PCB) Remediation
City Scrap & Salvage Facility
Akron, Ohio

On behalf of our client, City Scrap & Salvage, Conestoga-Rovers & Associates (CRA) is in the process of preparing an application to your department in accordance with the requirements of *40CFR761.61 C, Risk-Based Cleanup*, for authorization to proceed with the remediation of PCB impacted soils at the City Scrap & Salvage facility (Site) located in Akron, Ohio. As discussed last week, prior to submitting the application, we are forwarding to you a brief summary of information related to the Site for an informal review. This informal review will help us identify any data gaps with the application before it is submitted in a formal manner to your department.

The Site which is located in an industrial part of the City of Akron, Ohio, has operated as a scrap metal processing facility for over 50 years on a 10-acre parcel of land. As part of site characterization for a pending property transaction, PCBs were identified in the soil at the Site. In total, 267 soil samples were collected and analyzed for PCBs, with results as follows:

- 77 samples were non-detect;
- 98 samples were less than 1 ppm;
- 67 samples were equal to or greater than 1 ppm, but less than 10 ppm;
- 13 samples were equal to or greater than 10 ppm, but less than 25 ppm;
- 10 samples were equal to or greater than 25 ppm, but less than 50 ppm, and
- 2 samples were greater than 50 ppm (52 ppm and 74 ppm).

Based on a review of the analytical data and observations of the operating conditions at the Site, the proposed remediation can be summarized as follows:

- On property – soils with total PCBs greater than 50 ppm – excavate soils and transport to the EQ Company Landfill in Belleville, MI. (two areas impacted, approximately 75 cubic yards).
- On Property – soils with total PCBs greater than or equal to 10 ppm but less than 50 ppm- excavate impacted soil and transport to the Waste Management American landfill in Waynesburg, Ohio. (Approximately 710 cubic yards of soil).
- Adjoining off-property (CSX railway) - soils with total PCBs greater than or equal to 1 ppm (6 sample locations) – excavate impacted soil and either transport to the Waste Management American Landfill in Waynesburg, Ohio or use as fill for grading purposes on property in area under proposed concrete cap. (Approximately 150 cubic yards of soil).

The overall remedial goals, with the objective of obtaining closure for the Site, are as follows:

- On – property – remove all soil containing total PCB greater than 10 mg/ kg;
- Off-property – remove all soil containing total PCB greater than 1 mg/kg

The attached Conceptual Approach Summary contains the following information:

1. Site Description
2. Site Characterization Data Box Figures (Soil and Groundwater)
3. Proposed Remediation and Disposal of PCB Impacted Soils
4. Proposed Post Excavation Sampling Protocol
5. Backfilling and Restoration Plan
6. Schedule

As a final note, both the property owner and the perspective purchaser are motivated to begin the remediation process as soon as practical, and any assistance or recommendations that can be provided to fast track this process would be much appreciated.

We appreciate your help to conduct this informal pre-application review and look forward to receiving your feedback on this summary document.

Should you have any questions please do not hesitate to contact our office.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Jeroen Winterink

JW/po/01

c.c.: Neal Weinfield (Greenberg Traurig, LLP)
Steve Katz (City Scrap & Salvage)
Randy Katz (City Scrap & Salvage)
Henry Cooke (CRA)

CONCEPTUAL APPROACH SUMMARY
PCB IMPACTED SOIL REMEDIATION
CITY SCRAP & SALVAGE SITE
AKRON, OHIO

Site Description

- 785 Flora Avenue in City of Akron (Summit County) Ohio- see Figure 1a for Site Location, Figure 1b for Site Plan.
- Approximately 10 acres in size, zoned industrial.
- Operating scrap metal and automobile salvage/ shredder process facility (since 1940s).
- Bounded to north by CSX mainline railroad.
- Bounded to south warehouse (Cotter Storage Industries) and Flora Avenue.
- Existing perimeter fence.

Site Characterization

- Three characterization events – August 2008 (Sanborn Head), March 2009 (CRA) and May 2009 (CRA).
- A total of 267 soil and concrete samples collected and analyzed for total PCBs using SW-846 8082. Results are as follows:
  - 77 samples were non-detect;
  - 98 samples were less than 1 ppm;
  - 67 samples were equal to or greater than 1 ppm, but less than 10 ppm;
  - 13 samples were equal to or greater than 10 ppm, but less than 25 ppm;
  - 10 samples were equal to or greater than 25 ppm, but less than 50 ppm, and
  - 2 samples were greater than 50 ppm (52 ppm and 74 ppm)
- See Figures 2a, 2b and 2c for soil sample locations and results.
- August 2008 event included installation of four monitoring wells and collection of a round of groundwater samples. All groundwater samples were non-detect – see figure 3 for groundwater results.

Proposed Remediation

- On property – soils with total PCBs greater than 50 ppm – excavate soils and transport to the EQ Company Landfill in Belleville, MI. (two areas impacted, approximately 75 cubic yards).
- On Property – soils with total PCBs greater than or equal to 10 ppm but less than 50 ppm- excavate impacted soil and transport to the Waste Management American landfill in Waynesburg, Ohio. (Approximately 710 cubic yards of soil).
- Off property (CSX railway) - soils with total PCBs greater than or equal to 1 ppm (6 sample locations) – excavate impacted soil and either transport to the Waste Management American Landfill in Waynesburg, Ohio or use as fill for grading purposes on property in area under proposed concrete cap. (Approximately 150 cubic yards of soil).
- Attached Figures 4a, 4b and 4c indicate proposed soil excavation areas.

CONCEPTUAL APPROACH SUMMARY
PCB IMPACTED SOIL REMEDIATION
CITY SCRAP & SALVAGE SITE
AKRON, OHIO

Post Excavation Verification – On Property

- Collect grab samples from excavated areas at a rate of one surficial grab sample per 200 square feet of excavated area.
- Analyze a composite of the grab samples from each non-contiguous excavation, to a maximum of 6-grab samples per a composite sample.
- Surficial grab samples to be collected from the upper 3-inches of soil.
- Composite soil sample analytical results to be less than 10 ppm total PCBs: if greater than or equal to 10 ppm total PCBs, continue soil excavation in affected area and repeat post excavation sampling.

Post Excavation Verification – Off- Property (CSX Railway)

- Collect and analyze grab samples from excavated areas at a rate of one surficial grab sample per 100 square feet of excavated area.
- Surficial grab samples to be collected from the upper 3-inches of soil.
- Grab sample analytical results to be less than 1 ppm total PCBs: if greater than or equal to 1 ppm total PCBs, continue soil excavation in affected area and repeat post excavation sampling.

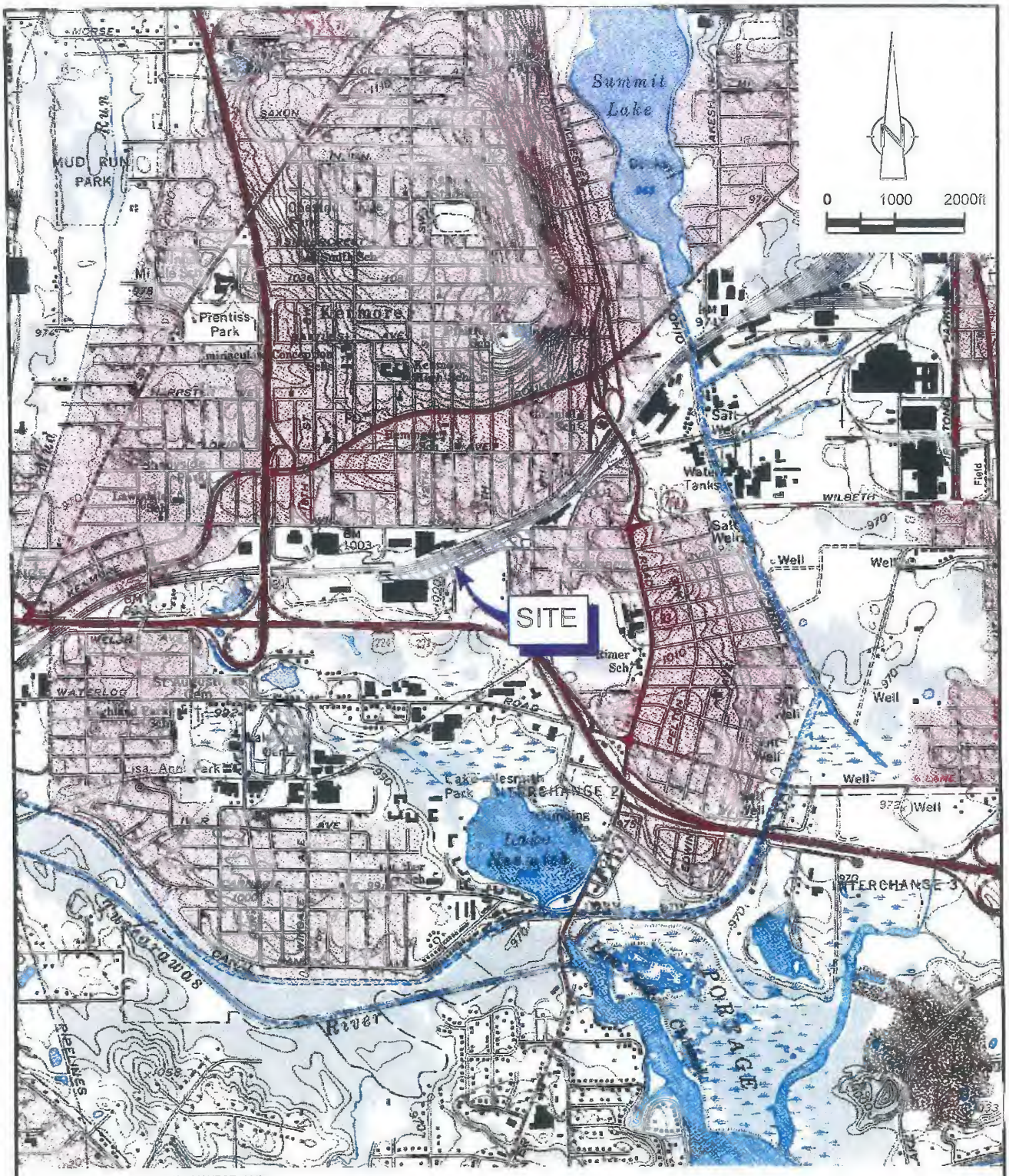
.

Site Restoration/ Cover System

- All excavated areas will be backfilled with clean imported fill material.
- Following backfill of the excavations, the Site will be regraded and the storm water management plan will be updated.
- A concrete slab, approximately 1 foot thick, will be constructed in the vicinity of the car shredder, as presented in Figure 5. Concrete will include integral curbs and gutters.
- Non-concrete access roadways will receive new granular surface topping.

Tentative Implementation Schedule

- Excavation and backfilling are ideally completed in August 2009.

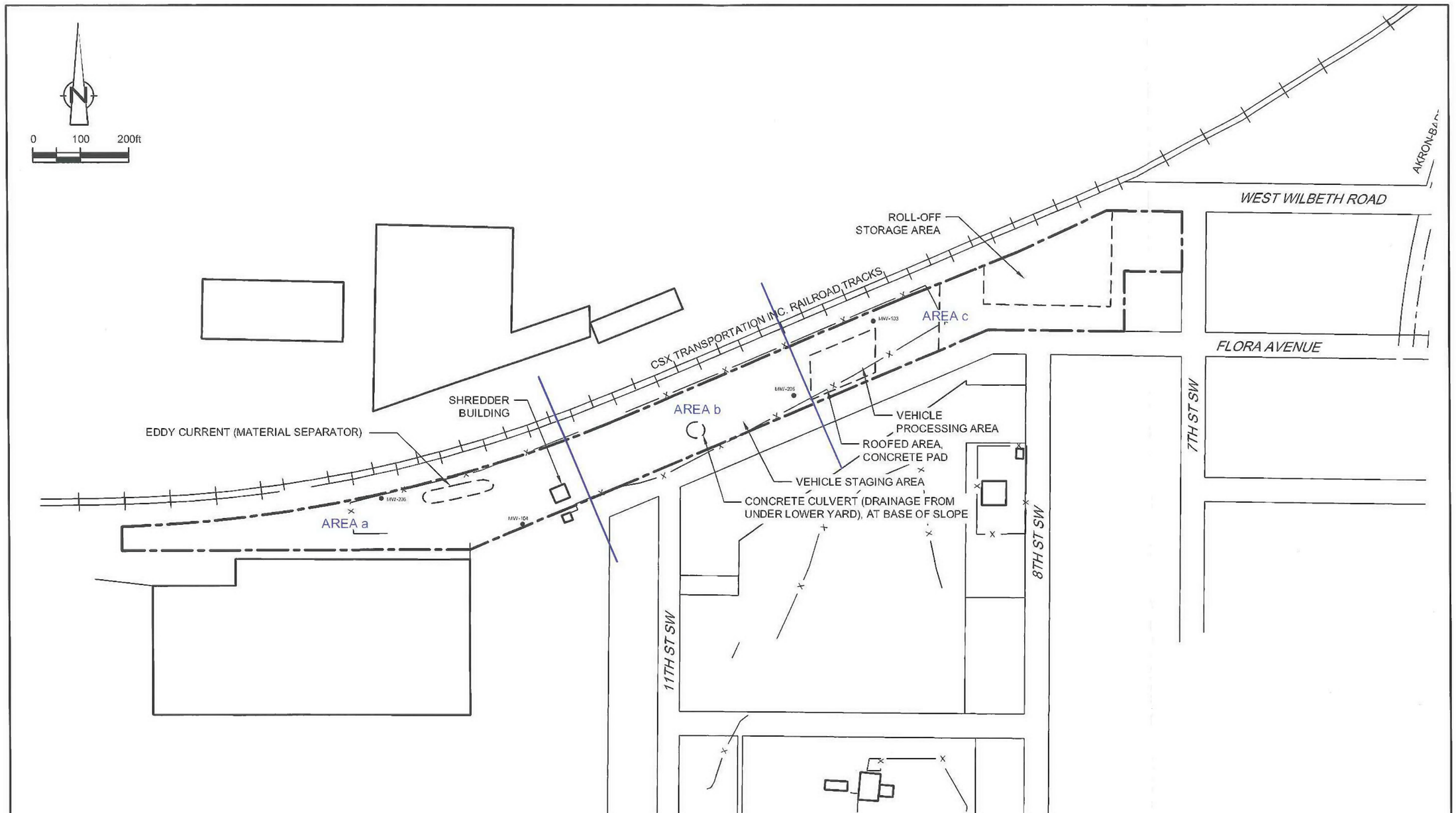


SOURCE: USGS QUAD AKRON WEST, OHIO.

figure 1a

SITE LOCATION MAP
CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

53724-00(RAMA001-CI)GN-WA005 JUN 10/2009



SOURCES:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY, 2927.00ITY SCRAP REPORT, AUGUST 21, 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY, PROJECT NO. T-1593, AUGUST 2008.

figure 1b

SITE PLAN WITH MATCH LINES
CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

53724-00(RAMA001-CI)GN-WA007 JUN 11/2009

EDDY CURRENT

SHREDDER BUILDING

0 10 20

LEGEND
- PROPERTY BOUNDARY
- RAILROAD TRACKS
- FENCE
- CONTOUR
- SHA DATA
- CRA DATA (MARCH 2009)
- CRA DATA (MAY 2009)
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH
- RESULT (mg/kg)
- PARAMETER

TOTAL PCB CONCENTRATIONS
- < 1 ppm PCBs
- ≥ 1 up to < 10 ppm PCBs
- ≥ 10 up to < 25 ppm PCBs
- ≥ 25 up to < 50 ppm PCBs
- ≥ 50 ppm PCBs

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

CITY SCRAP AND SALVAGE FACILITY

AKRON, OHIO

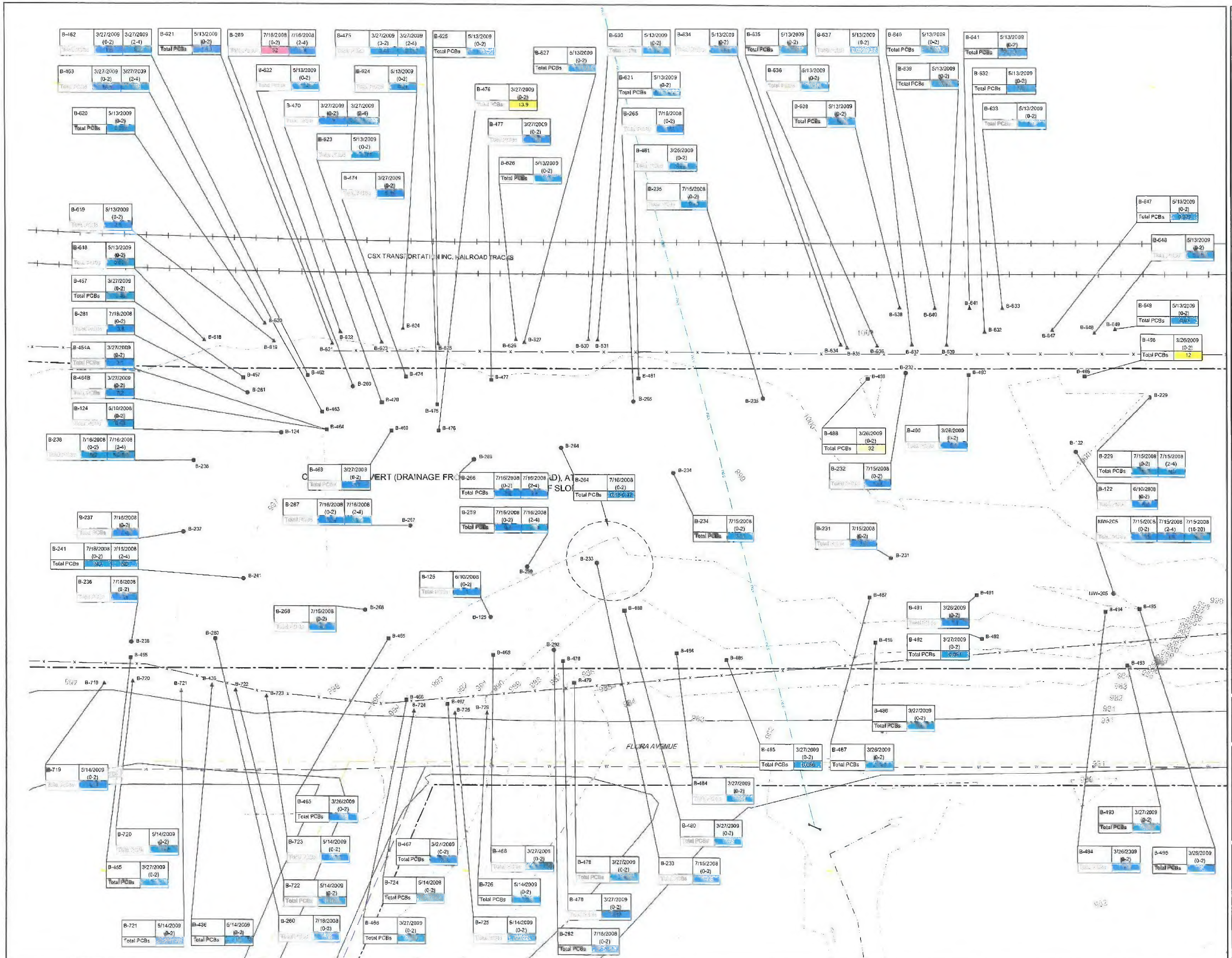
TOTAL PCB CONCENTRATIONS
SHREDDED METAL AND FLUFF PROCESSING AREA

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TRADE COMPANY, 2007/08, DEV SCRAP REPORT, AUGUST 21, 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY, PROJECT NO. T-933, APR2, 2009.

Project Manager:	Reviewed By:	Date:
K.C.	G.P.	JUNE 2009
Scale: 1:20	Project No.: 53724-00	Report No.: RAMA001-CI
		Drawing No.: figure 2a

53724-00(RAMA001-CI)GN-WA001.JUN 10/2009


CSX TRANSPORTATION INC. RAILROAD TRACKS
FLORA AVENUE
B-462 3/27/2009 (0-2) 3/27/2009 (2-4) Total PCBs
B-621 5/13/2009 (0-2) Total PCBs
B-269 7/16/2008 (0-2) 7/16/2008 (2-4) Total PCBs 52
B-475 3/27/2009 (0-2) 3/27/2009 (2-4) Total PCBs
B-625 5/13/2009 (0-2) Total PCBs
B-627 5/13/2009 (0-2) Total PCBs
B-463 3/27/2009 (0-2) 3/27/2009 (2-4) Total PCBs
B-622 5/13/2009 (0-2) Total PCBs
B-624 5/13/2009 (0-2) Total PCBs
B-476 3/27/2009 (0-2) Total PCBs 13.9
B-470 3/27/2009 (0-2) 3/27/2009 (2-4) Total PCBs
B-620 5/13/2009 (0-2) Total PCBs
B-477 3/27/2009 (0-2) Total PCBs
B-623 5/13/2009 (0-2) Total PCBs
B-626 5/13/2009 (0-2) Total PCBs
B-474 3/27/2009 (0-2) Total PCBs
B-630 5/13/2009 (0-2) Total PCBs
B-634 5/13/2009 (0-2) Total PCBs
B-635 5/13/2009 (0-2) Total PCBs
B-637 5/13/2009 (0-2) Total PCBs
B-640 5/13/2009 (0-2) Total PCBs
B-641 5/13/2009 (0-2) Total PCBs
B-631 5/13/2009 (0-2) Total PCBs
B-636 5/13/2009 (0-2) Total PCBs
B-639 5/13/2009 (0-2) Total PCBs
B-632 5/13/2009 (0-2) Total PCBs
B-265 7/16/2008 (0-2) Total PCBs
B-638 5/13/2009 (0-2) Total PCBs
B-633 5/13/2009 (0-2) Total PCBs
B-481 3/26/2009 (0-2) Total PCBs
B-235 7/15/2008 (0-2) Total PCBs
B-619 5/13/2009 (0-2) Total PCBs
B-647 5/13/2009 (0-2) Total PCBs
B-618 5/13/2009 (0-2) Total PCBs
B-648 5/13/2009 (0-2) Total PCBs
B-457 3/27/2009 (0-2) Total PCBs
B-649 5/13/2009 (0-2) Total PCBs
B-281 7/18/2008 (0-2) Total PCBs
B-454A 3/27/2009 (0-2) Total PCBs
B-496 3/26/2009 (0-2) Total PCBs 12
B-464B 3/27/2009 (0-2) Total PCBs
B-124 6/10/2008 (0-2) Total PCBs
B-238 7/16/2008 (0-2) 7/16/2008 (2-4) Total PCBs ND
B-488 3/26/2009 (0-2) Total PCBs 32
B-490 3/26/2009 (0-2) Total PCBs
B-229 7/15/2008 (0-2) 7/15/2008 (2-4) Total PCBs
B-469 3/27/2009 (0-2) Total PCBs
B-266 7/16/2008 (0-2) 7/16/2008 (2-4) Total PCBs
B-264 7/16/2008 (0-2) Total PCBs
B-232 7/15/2008 (0-2) Total PCBs
B-122 6/10/2008 (0-2) Total PCBs
B-267 7/16/2008 (0-2) 7/16/2008 (2-4) Total PCBs
B-259 7/16/2008 (0-2) 7/16/2008 (2-4) Total PCBs
B-234 7/15/2008 (0-2) Total PCBs
B-231 7/15/2008 (0-2) Total PCBs
MW-205 7/15/2008 (0-2) 7/15/2008 (2-4) 7/15/2008 (16-20) Total PCBs
B-237 7/16/2008 (0-2) Total PCBs
B-241 7/18/2008 (0-2) 7/18/2008 (2-4) Total PCBs ND ND
B-125 6/10/2008 (0-2) Total PCBs
B-236 7/16/2008 (0-2) Total PCBs
B-268 7/16/2008 (0-2) Total PCBs
B-491 3/26/2009 (0-2) Total PCBs
B-492 3/27/2009 (0-2) Total PCBs
B-486 3/27/2009 (0-2) Total PCBs
B-485 3/27/2009 (0-2) Total PCBs 0.086
B-487 3/26/2009 (0-2) Total PCBs
B-719 5/14/2009 (0-2) Total PCBs
B-484 3/27/2009 (0-2) Total PCBs
B-465 3/26/2009 (0-2) Total PCBs
B-480 3/27/2009 (0-2) Total PCBs
B-493 3/27/2009 (0-2) Total PCBs
B-720 5/14/2009 (0-2) Total PCBs
B-723 5/14/2009 (0-2) Total PCBs
B-467 3/27/2009 (0-2) Total PCBs
B-468 3/27/2009 (0-2) Total PCBs
B-479 3/27/2009 (0-2) Total PCBs
B-233 7/15/2008 (0-2) Total PCBs
B-494 3/26/2009 (0-2) Total PCBs
B-495 3/26/2009 (0-2) Total PCBs
B-455 3/27/2009 (0-2) Total PCBs
B-722 5/14/2009 (0-2) Total PCBs
B-724 5/14/2009 (0-2) Total PCBs
B-726 5/14/2009 (0-2) Total PCBs
B-478 3/27/2009 (0-2) Total PCBs
B-721 5/14/2009 (0-2) Total PCBs
B-436 5/14/2009 (0-2) Total PCBs
B-260 7/18/2008 (0-2) Total PCBs
B-466 3/27/2009 (0-2) Total PCBs
B-725 5/14/2009 (0-2) Total PCBs
B-262 7/18/2008 (0-2) Total PCBs

0 10 20ft

LEGEND
- PROPERTY BOUNDARY
- RAILROAD TRACKS
- FENCE
- CONTOUR
- SHA DATA
- CRA DATA (MARCH 2009)
- CRA DATA (MAY 2009)
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH
- RESULT (mg/kg)
- PARAMETER

TOTAL PCB CONCENTRATIONS
- < 1 ppm PCBs
- ≥ 1 up to < 10 ppm PCBs
- ≥ 10 up to < 25 ppm PCBs
- ≥ 25 up to < 50 ppm PCBs
- ≥ 50 ppm PCBs

SCALE VERIFICATION
THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

CITY SCRAP AND SALVAGE FACILITY
AKRON, OHIO

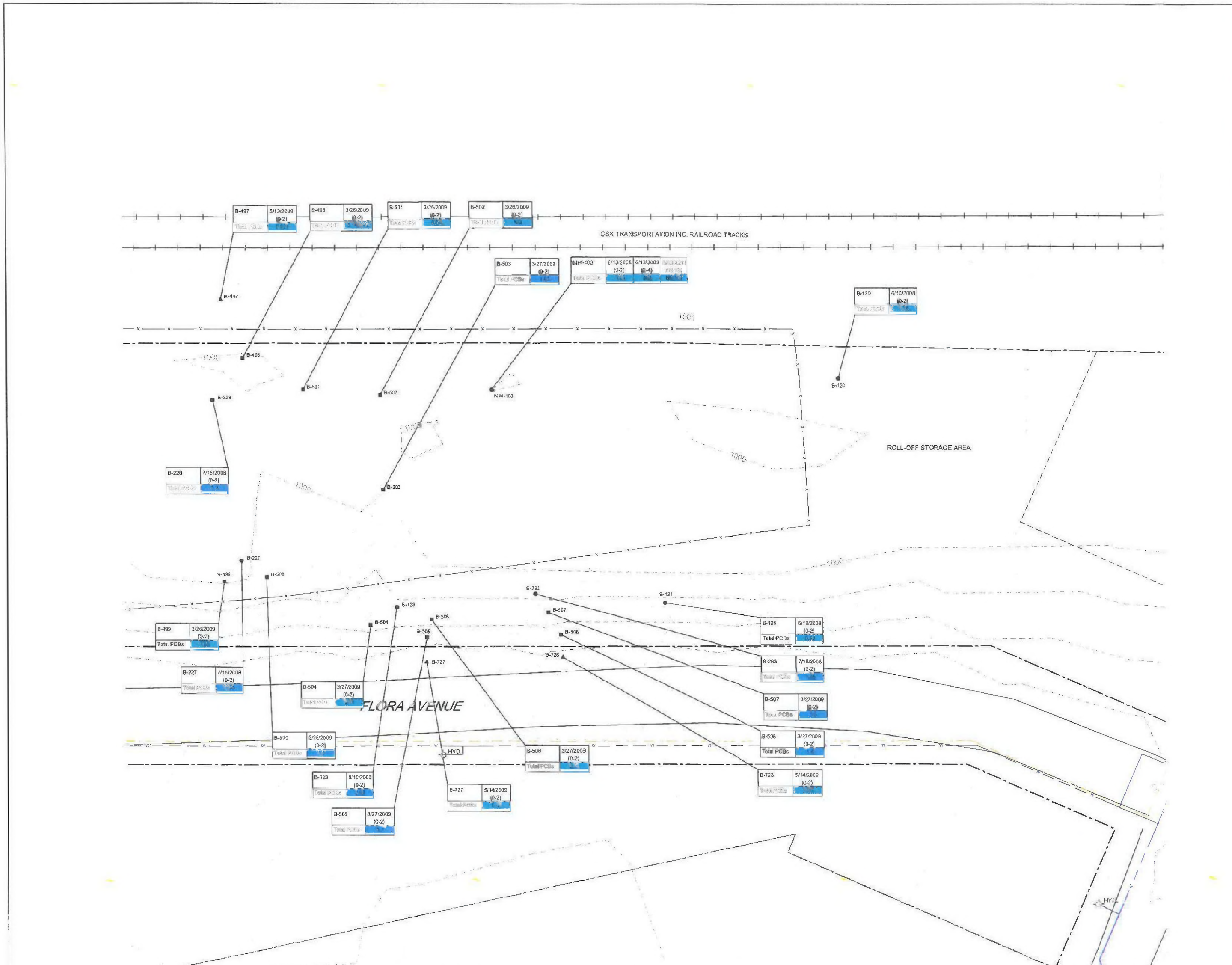
TOTAL PCB CONCENTRATIONS
PRE-SHREDDER PROCESSING

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY, 2927.00 CITY SCRAP REPORT, AUGUST 21, 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY PROJECT NO. T-1590, APRIL 2009

Project Manager:	Reviewed By:	Date:	
H.C.	G.P.	JUNE 2009	
Scale: 1:20	Project Nº: 53724-00	Report Nº: RAMA001-CI	Drawing Nº: figure 2b

53724-00(RAMA001-CI)GN-WA001 JUN 10/2009



LEGEND

- PROPERTY BOUNDARY
- RAILROAD TRACKS
- FENCE
- CONTOUR
- SHA DATA
- CRA DATA (MARCH 2009)
- CRA DATA (MAY 2009)

B-288	7/21/2008 (0-2)	SAMPLE LOCATION / SAMPLE DATE / SAMPLE DEPTH
Total PCBs	39.1	RESULT (mg/kg) / PARAMETER

TOTAL PCB CONCENTRATIONS

- < 1 ppm PCBs
- ≥ 1 up to < 10 ppm PCBs
- ≥ 10 up to < 25 ppm PCBs
- ≥ 25 up to < 50 ppm PCBs
- ≥ 50 ppm PCBs

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

CITY SCRAP
AND SALVAGE FACILITY

AKRON, OHIO

TOTAL PCB CONCENTRATIONS
VEHICLE PREPARATION AREA

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY 2027.00 CITY SCRAP REPORT AUGUST 21 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY PROJECT NO. T-1253 APRIL 2009

Project Manager: F.C.	Reviewed By: G.P.	Date: JUNE 2009	
Scale: 1:20	Project Nº: 53724-00	Report Nº: RAMA001-CI	Drawing Nº: figure 2c

53724-00(RAMA001-CI)GN-WA001 JUN 10/2009

EDDY CURRENT (MATERIAL SEPARATOR)

SHREDDER BUILDING

FLORA

0 10 20ft

LEGEND

- PROPERTY BOUNDARY
- RAILROAD TRACKS
- FENCE
- CONTOUR
- SHA DATA
- CRA DATA (MARCH 2000)
- CRA DATA (MAY 2009)
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH
- RESULT (mg/kg)
- PARAMETER

TOTAL PCB CONCENTRATIONS

- < 1 ppm PCBs
- ≥ 1 up to < 10 ppm PCBs
- ≥ 10 up to < 25 ppm PCBs
- ≥ 25 up to < 50 ppm PCBs
- ≥ 50 ppm PCBs
- PROPOSED ON-SITE EXCAVATION
- PROPOSED OFF-SITE EXCAVATION

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

CITY SCRAP AND SALVAGE FACILITY

AKRON, OHIO

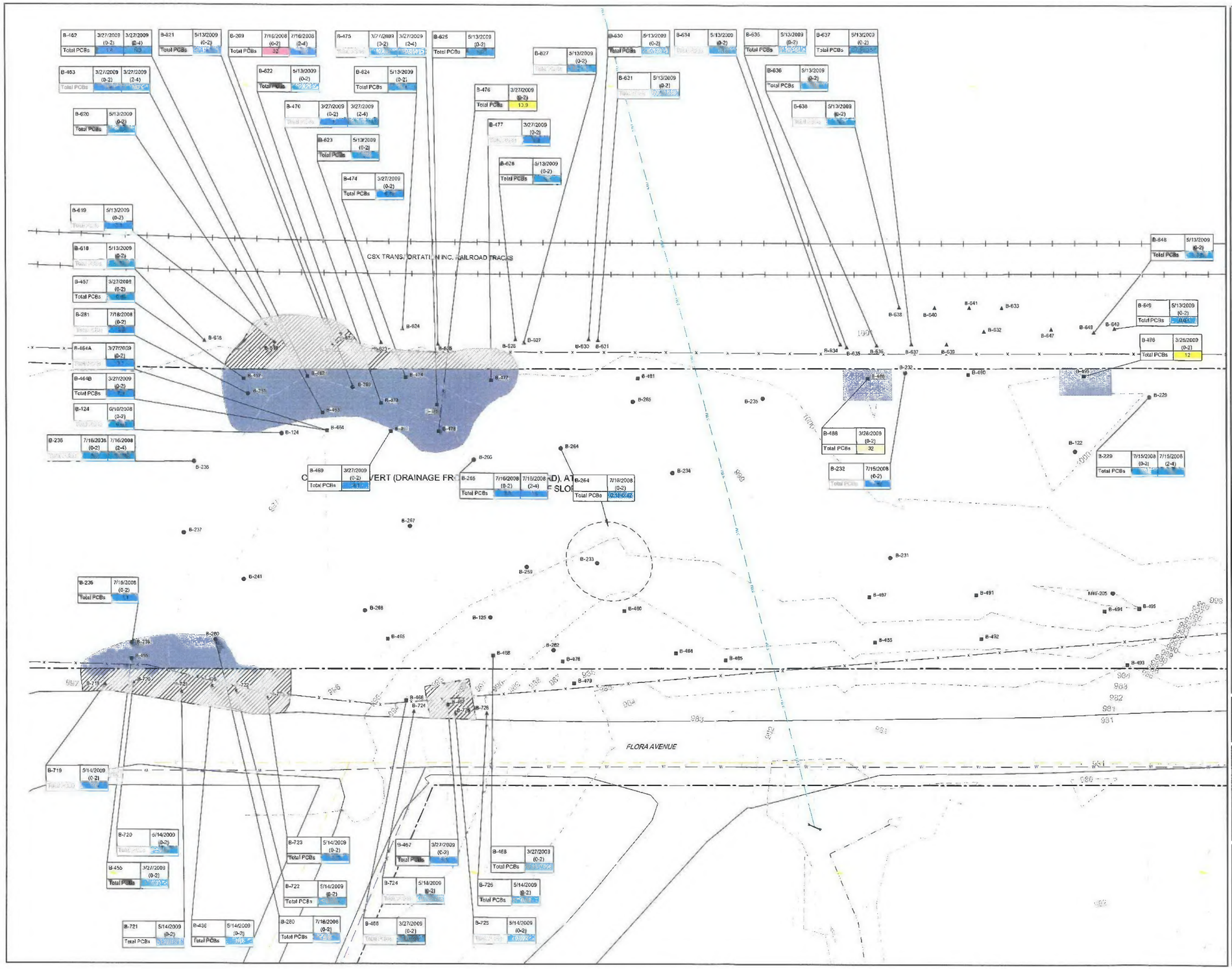
PROPOSED SOIL EXCAVATION PLAN SHREDDED METAL AND FLUFF PROCESSING AREA

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS);
THE TIMKEN COMPANY, 2007-09 ITY SCRAP REPORT, AUGUST 21, 2009;
ADVANCE TECHNOLOGIES AUTHORIZED LAND TITLE SURVEY, PROJECT NO. 5-493 APRIL 2000.

Project Manager:	Reviewed By:	Date:
H.C.	G.P.	JUNE 2009
Scale: 1:20	Project No.: 53724-00	Report No.: RAMA001-CI
		Drawing No.: figure 4a

53724-C(RAM/AC01-CI)GN-WA003 JUN 11/2009



SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL, ADJUST SCALE ACCORDINGLY.

CITY SCRAP AND SALVAGE FACILITY

AKRON, OHIO

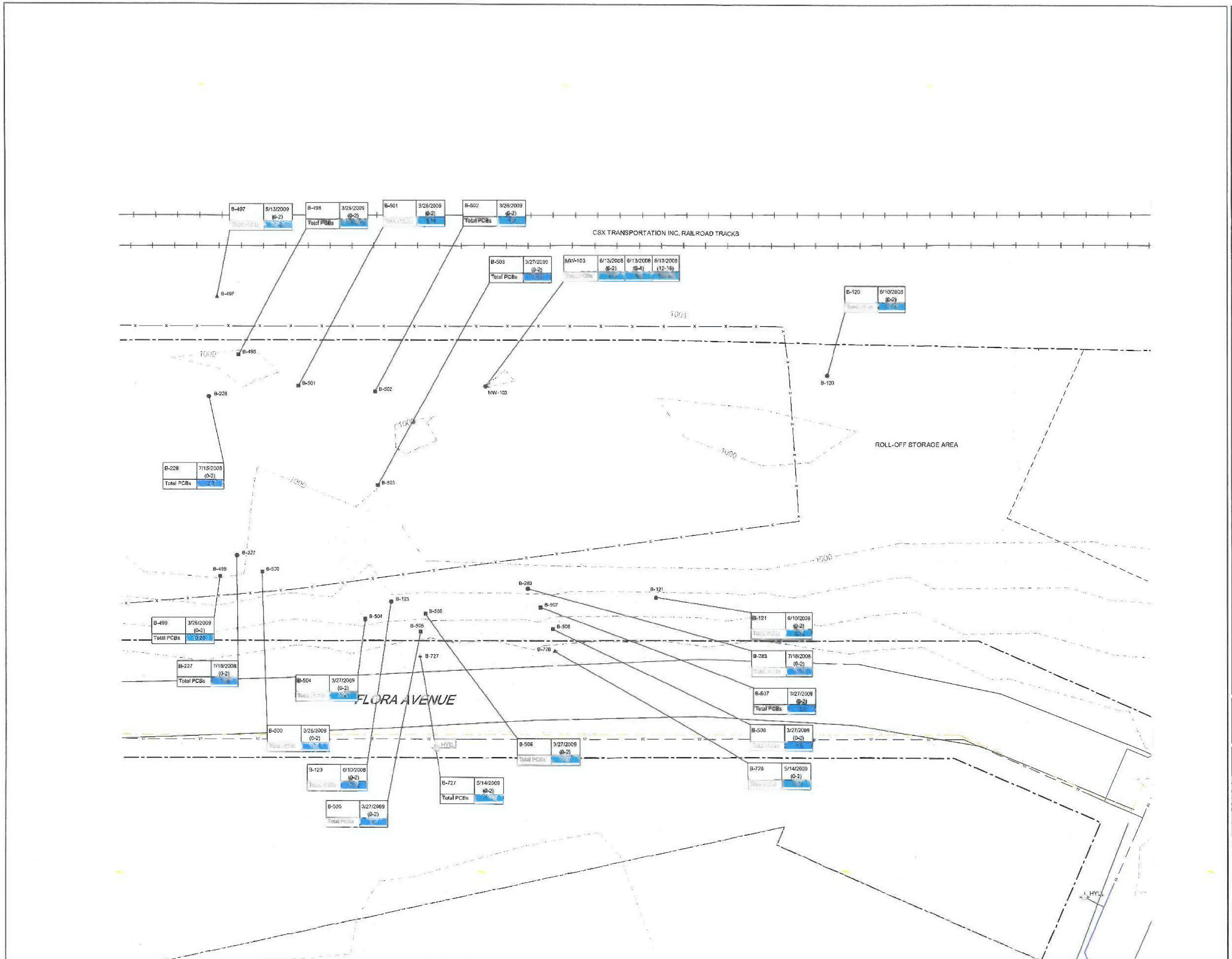
PROPOSED SOIL EXCAVATION PLAN PRE-SHREDDER PROCESSING

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY 250.00' CITY SCRAP REPORT AUGUST 31 2005
ACCURATE TECHNOLOGIES AITKAUSEN LAND TITLE SURVEY PROJECT NO. T-193 APRIL 2005

Project Manager:	Reviewed By:	Date:
K.C.	G.P.	JUNE 2009
Scale: 1:20	Project N°: 53724-00	Report N°: RAMA001-CI / Drawing N°: figure 4b

53724-00(RAMA001-CI)GN-WA003 JUN 10/2009



0 10 20ft

LEGEND

- PROPERTY BOUNDARY
- RAILROAD TRACKS
- FENCE
- CONTOUR
- SHA DATA
- CRA DATA (MARCH 2009)
- CRA DATA (MAY 2009)
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH
- RESULT (mg/kg)
- PARAMETER

TOTAL PCB CONCENTRATIONS

- < 1 ppm PCBs
- ≥ 1 up to < 10 ppm PCBs
- ≥ 10 up to < 25 ppm PCBs
- ≥ 25 up to < 50 ppm PCBs
- ≥ 50 ppm PCBs
- PROPOSED ON-SITE EXCAVATION
- PROPOSED OFF-SITE EXCAVATION

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

CITY SCRAP
AND SALVAGE FACILITY

AKRON, OHIO

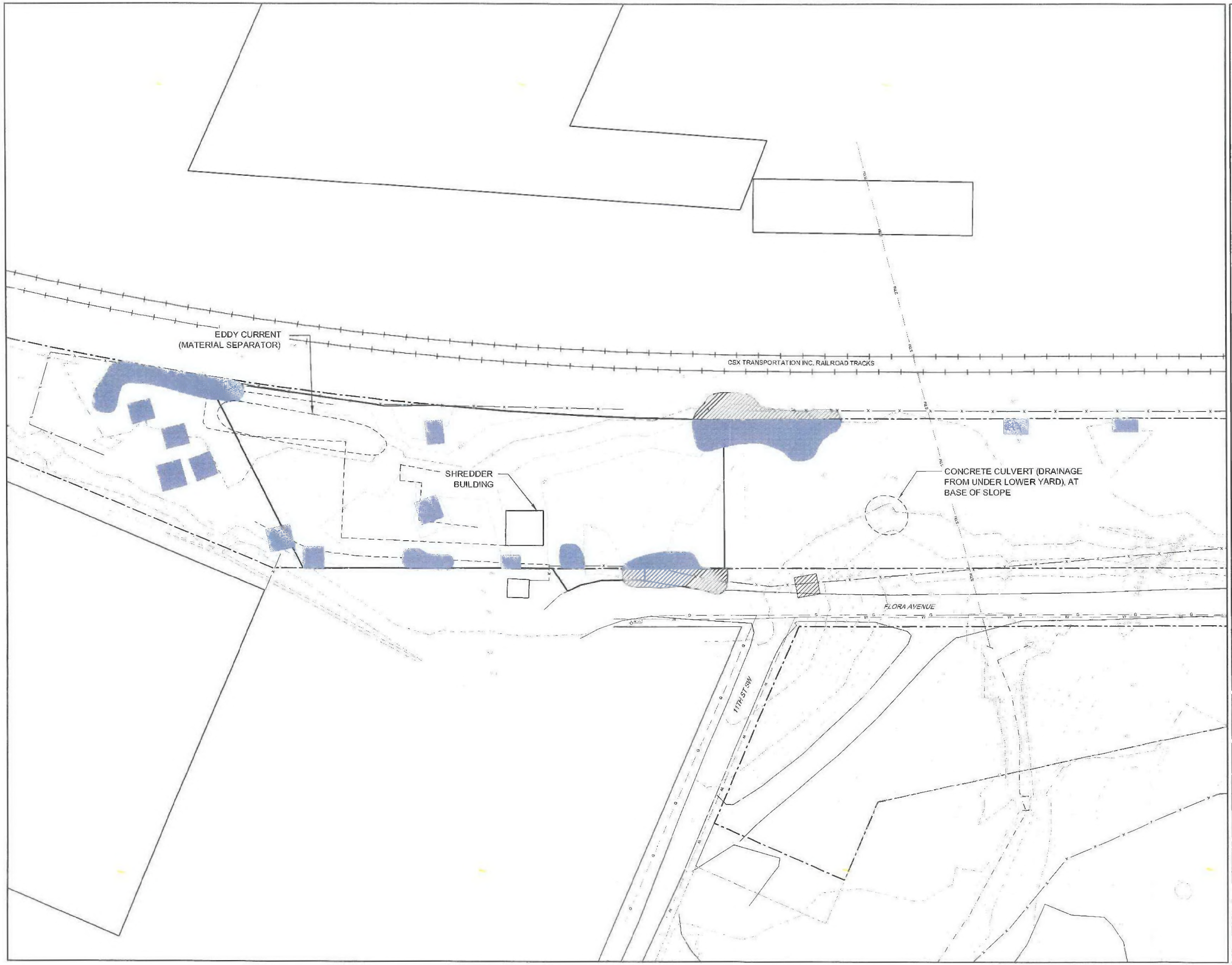
PROPOSED SOIL EXCAVATION PLAN
VEHICLE PREPARATION AREA

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY, 39200 CITY SCRAP REPORT AUGUST 21, 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY PROJECT NO. T-1593 APRIL 2008.

Project Manager:	Reviewed By:	Date:	
H.C.	G.P.	JUNE 2009	
Scale: 1:20	Project Nº: 53724-00	Report Nº: RAMA001-CI	Drawing Nº: figure 4c

53724-00(RAMA001-CI)GN-WA003 JUN 11/2009



0 20 40ft

LEGEND
- PROPERTY BOUNDARY
- RAILROAD TRACKS
- FENCE
- CONTOUR
- SHA DATA
- CRA DATA (MARCH 2009)
- CRA DATA (MAY 2009)
- PROPOSED ON-PROPERTY EXCAVATION
- PROPOSED OFF-PROPERTY EXCAVATION
- APPROXIMATE EXTENT OF PROPOSED CONCRETE SURFACING

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

LOWER YARD, CITY SCRAP AND SALVAGE FACILITY

AKRON, OHIO

PROPOSED NEW CONCRETE SURFACING

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY, 2921.00 ITY SCRAP REPORT AUGUST 21, 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY PROJECT NO. T-1393 APRIL 2009.

Project Manager:	Reviewed By:	Date:	
H.C.	G.P.	JUNE 2009	
Scale: 1:40	Project Nº: 53724-00	Report Nº: RAMA001-CI	Drawing Nº: figure 5

53724-00(RAMA001-CI)GN-WA004 JUN 10/2009